

ROTH & ROTH, LLP

192 LEXINGTON AVENUE, SUITE 802, NEW YORK, NEW YORK 10016
ROTHANDROTHLAW.COM T: (212) 425-1020 F: (212) 532-3801

January 30, 2023

VIA Email

Hon. Marian W. Payson
United States Magistrate Judge
2720 U.S. Courthouse
100 State Street
Rochester, NY 14614

Re: *Hawkins v. City of Rochester et al,*
22-cv-6228 (EAW)(MWP)

Dear Judge Payson,

I write to submit the instant joint letter motion for a 120-day extension of all the deadlines in the scheduling order, ECF 5. The new deadlines would be: Status Conference on May 31, 2023; Initial mediation session to be held by March 13, 2023; mediation referral shall terminate on May 17, 2023; motions to join parties/amend pleadings due by April 3, 2023; Motions to Compel due by May 15, 2023; Discovery completed by June 15, 2023; Plaintiff expert witness ID due by July 13, 2023; Defendant Expert Witness ID due by August 15, 2023; Expert discovery, including depositions, completed by September 16, 2023. Dispositive Motions due by October 18, 2023.

Additional time is needed because the parties were delayed in obtaining and exchanging documents that were necessary for the mediation, and the initial mediation session has not yet taken place. However, the parties have selected

William Bauer as the mediator for this case, and are ready to schedule the initial mediation session.

Thank you for your consideration of this request. Should the Court have any questions or concerns, please do not hesitate to have one of your clerks contact me.

Respectfully Submitted,

~//s//~

Elliot Dolby Shields

The joint request is granted and the deadlines shall be extended as proposed. The telephone status conference set for January 31, 2023 is adjourned until **May 31, 2023, at 11:00 a.m.**
Dial-in instructions will be emailed to counsel prior to the conference.

IT IS SO ORDERED.

s/Marian W. Payson
Hon. Marian W. Payson
United States Magistrate Judge

Dated: January 31, 2023